WA ~~2314~~ 2917

7-15-86
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RCRA COMPLIANCE
REGION 10

EPA INSPECTION REPORT SUBMITTAL SLIP

FILE COPY

I. Submitted By: A. Boyd Date: 6/3/88

✓ Narrative
✓ Checklist(s)
✓ Photos
✓ Attachment(s)
___ Comments

COMPANY NAME
Chem Pro - P91
Insp of 7/15/86
WAD... 2917

No CMEL Attached — previously submitted

II. Date Reviewed: 6/29/88
Reviewed By: [illegible]
Title: Chief RCS

✓ Accepted ___ Returned

III. Comments:

IV. Route To:
(1) Bill A. — for next insp background if defic. not corrected → action
(2) File: RCRA Compliance

Narrative Inspection Report

Facility: Chemical Processors, Inc. (Chem Pro)
ID No. WADO0812917
Address: Pier 91, Seattle Washington

Date of Inspection: July 15, 1986

Inspectors: A. Boyd, EPA – Seattle
M. Rosenberg, EPA – Seattle
L. Ashley, DOE – Northwest

Report prepared by: Andrew Boyd 5/31/86
RCRA Compliance Section
EPA – Seattle

Purposes of the Inspection:

(1) to assess compliance with applicable hazardous waste laws and regulations,
(2) to provide field experience and training,
(3) to exchange information on field activities with state personnel.

Introduction

The State of Washington Department of Ecology (DOE) hazardous waste program has been authorized by EPA, and operates in lieu of the federal program. However, EPA retains responsibility for administering requirements imposed by the 1984 amendments to RCRA. The facility is located on the Pier 91 compound, which is owned by the Port of Seattle.

General Facility and Process Information

The Chem Pro facility opened on 7/1/70 and operates primarily as a waste oil reclamation facility. Re-usable oil is reclaimed by seperating impurities in tanks. Oil/water seperation, phenol oxidation, precipitation of heavy metals, pH adjustment, and chromium reduction in the tanks are the methods described in the facility's Part A permit application. Waste is received from a number of sources, including petroleum refining, bilge water from barges and tankers, paint booth wastes, and contaminated wash water.

Notification and Permitting

Chem Pro submitted a Notification of Hazardous Waste Activity (form 8700-12) dated 8/13/80, received by EPA on 8/18/80. The notification indicated that the facility is a generator, transporter, and treatment, storage & disposal facility.

Rec'd 6/3/88

Chem Pro submitted a Part A application dated 11/14/80, received by EPA on 11/18/80. The Part A was revised on 7/23/82, and on 2/18/86. The revised Part A indicates that the facility treats and stores hazardous waste in tanks, and operates a centrifuge for dewatering solids and sludges. The facility reported a tank storage capacity of 9,036,090 gallons, and a tank treatment capacity of 40,000 gallons per day.

Facility Inspection - General

Arrangement were made with L. Ashley of DOE to conduct a joint inspection of the facility. L. Ashley contacted the facility and scheduled the inspection.

Opening Conference

The inspection team arrived at the Chem Pro offices on Airport Way at about 9:05 a.m. We were met by Dennis Stefani, Chem Pro Manager of Regulatory Affairs. We drove to the facility at Pier 91, arriving approximately 9:20 a.m. At the facility office an attendance sheet was passed amongst the inspection participants (attached), and I showed D. Stefani my inspection credential. In attendance were the inspection team (Boyd, Rosenberg, and Ashley), D. Stefani - Chem Pro Manager of Regulatory Affairs, Bob Moody - Chem Pro Pier 91 Plant Manager, Rick Morton - Chem Pro Operations Manager, and Susan Donahue - Chem Pro Compliance Specialist.

I told Chem Pro officials that the purpose of the inspection was to assess facility compliance with applicable hazardous waste laws and regulations. I then questioned B. Moody on facility operations. His descriptions of operations were as follows.

> They recieve waste oil, some industrial wastes, machine cutting oils, ballast and bilge water, and oily waste water. The facility is sloped to direct any surface water outside the bermed tank farm areas to the oil/water seperator tank at the front of the facility. The oil water seperator is covered by a grate and is below ground.
>
> The facility is comprised primarily of tanks and associated valves and pipes. The tanks are numbered. Tanks 96, 97, and 98 are the main water tanks. They hold ballast and bilge water, and oily waste water. The water in these tanks is adjusted for pH to facilitate oil seperation. Oil content in these tanks is generally less than 1%. Water from these tanks is discharged to a METRO POTW treatment plant under a permit. Tank 99 receives waste oil.
>
> Tanks 94 and 100 are oil water seperation tanks, water is removed from the bottom to the water tanks, and oil is removed off the top. Tank 118 had been removed from the site and scrapped. It was taken out of service 6 to 8 years ago after acid was placed in it.

Tanks 106, 108, 109, and 111 are sludge holding tanks. The sludge is from tank bottoms. Tanks 105, 107, and 110 are oil treatment tanks. They have steam coils in them for thermal treatment. Tank 112 is a coolant holding and treatment tank. It is used to remove water soluble oils from machine coolants. Tank 114 contains reprocessed oil for sale.

Also on site is an unnumbered tank, called the Rec tank because of its rectangular shape. It is generally used to heat treat coolant. It contains steam coils. Tank 90 contains oil waste that is 80 - 90% water and sediment. They use the tank to seperate and remove the oil and water. Tanks 115, 116, 117 and 165 are used to treat hazardous waste. They each have a capacity of 10,000 gallons each. Other tanks on site are leased to Penoco, including tank 113 a boiler fuel tank.

Hazardous waste that is received is off-loaded directly to hazardous waste tanks. They pump to a 3 inch line which carries the material to the hazardous waste tank. They don't use the oil/water seperator tank for hazardous waste, though they may have spilled some into the tank in obtaining samples from hazardous waste loads. The facility has a 10 valve system for two manifolds, and can pump directly to any of the tanks at the plant.

Tanks

The facility is comprised of what Chem Pro calls waste oil and waste water tanks. Tanks (except the Rec Tank) are covered and are located on concrete pads with concrete containment berms. Chem Pro indicated that leak detection was visual, but that the tanks were also gauged daily.

Security

The facility is located inside the Pier 91 compound. The Pier 91 Compound is surrounded by a fence 6 feet or more high and topped by barbed wire. To enter the compound, one must pass through a gate monitored by a guard. According to Chem Pro, a guard is on duty 24 hours a day. A number of other facilities and operations are also located inside the compound.

According to Chem Pro officials the guard will stop all who try to enter to check their credentials, unless they have the appropriate car sticker. In addition there is a roving security force at Pier 91. The Chem Pro officials were not sure if there was a written agreement with the security force which outlined their procedures, staffing and hours of operation .

Contingency Plan, Waste Analysis Plan, and Closure Plan

A copy of the facility Spill Prevention Plan and Countermeasure Plan was obtained by mail after the inspection on April 9, 1985. An updated closure plan was sent to EPA on October 2, 1985 by A. Jeanne Van Wallendael. Copies of the contingency plan and waste analysis plan were obtained during the inspection on April 9, 1985. I examined the plans on site and confirmed that they were the same as those copied or received as part of the EPA/Ecology inspection conducted on April 9, 1985. In addition I obtained a copy of the facility training program, and the compatability plan for review. The contingency plan (and spill prevention and contermeasure plan), waste analysis plan, and updated closure plan were reviewed by an EPA contractor for compliance with applicable 40 CFR Part 265 requirements. The contractor reports are attached.

Waste Analysis and Operating Records

I questioned B. Moody and D. Stefani on waste analysis procedures for incoming hazardous waste loads. Their responses are summarized below.

Before hazardous waste is received, generators must first go through the sales office and prepare a waste profile sheet. The generators fill out the sheet and must submitt a representative sample to Chem Pro for confirmatory analyses. Profile sheets are sent to the Pier 91 facility when the waste has been cleared for shipment, and are filed there in the order recieved. The profile sheet program was begun early in 1985. Profile sheets are also filed by generator at the Georgetown office.

Profile sheets have not been prepared for all waste streams received. Profile sheets have not been prepared for waste streams that the facility had been receiving without problems prior to the institution of the profile sheet system in January 1985. This would include wastes the facility has received from Boeing and Lockheed. The facility relies on its historical experience with these waste streams in storing and treating these materials. The facility is, however, planning on obtaining profile sheets for those waste streams in the near future.

All wastes received at Pier 91 are tested and a waste receipt form generated. Facility operators conduct the sampling and analyses. Waste oil received at the facility is sampled by a long plastic tube which collects a sample across its length . A colorimetric test is performed on the sample for chlorinated hydrocarbons. If the waste tests positive, they run 2 additional tests on the same sample. If 2 of the 3 tests are positive, a sample is sent to the facility lab at Georgetown for additional analysis. At the lab they run analysis for PCBs using a gas chromatograph (detection limit 2 ppm). If there are greater than 50 ppm, they reject the shipment. If it is greater than 30 ppm, they consider rejection.

They also conduct flash point and viscosity tests on waste oil at the facility. If the flash point is below 140 degrees F, the shipment is refused.

For waste shipments that are accepted, a waste receipt form is prepared. It shows the results of analyses conducted at the facility, date of receipt, the generator, and destination of the waste within the facility. The waste receipts are filed at the facility by day and month. They are also indexed by manifest number, generator and waste type at the Georgetown offices. All loads, whether hazardous waste or not are tested at the facility and a waste receipt generated. Wastes are tracked at the facility by waste receipt number

The facility also maintains a daily operations log book. It lists incoming loads by waste receipt number and describes operations, such as treatment, movement of materials at the facility, and testing of materials in tanks. The facility also maintains daily gauging logs, which record the results of tank gauging. Also kept are work orders which may document treatment operations. Quantity of waste recieved is determined by before and after gauging of tanks. The gauging logs are also relied upon to prevent overfilling of tanks.

When treatment is completed in a particular tank, they will empty the tank, drawing the liquid off the bottom. Some sludge may remain. Sludges are removed approximately every 6 months.

Emergency Response

The facility does not have an alarm system, but does have 3 two way radios and air horns which are carried by operators while in the tank farm area. Arrangements have been made for emergency response with the fire department and with Crowley Environmental. A copy of the written arrangements made with Crowley Environmental is attached. No other written description of arrangements has been prepared. The facility never has had to implement the contingency plan. According to D. Stefani, emergency coordinators have the authority to commit corporate resources to address emergencies, but since Crowley Environmental is on contract to respond, in most cases they would simply implement the contract. B. Moody said he believes that the phone number for the emergency coordinators are correct. They have an on call person 24 hours a day, 7 days a week, who is accessed by their answering service. The on call person is not necessarilly an emergency coordinator.

Fire extinguishers, absorbant and absorbant pads are maintained on site for emergency response. The facility also has a foam pump for fire response. Foam can, according to B. Moody, be delivered to any of the tanks on their foam line system. The foam pump is powered by propane, and has 2500 barrels of water on hand, which is on continuous feed from the City water supply.

Training

The facility has recently developed a classroom training program composed of training modules. Two of the modules have been presented, the records from those presentations are attached (hazardous waste materials and waste shipping papers, and material safety data sheets). Primary Operator training is conducted as on the job training. Operators are qualified over roughly a six month period. After orientation they start as an assistant performing cleanup tasks, then tank gauging with a qualified operator, then assist operators in unloading trucks and tank lineups, before they are permitted to off load trucks themselves. Before they qualify as an operator, they must pass an operators test which among other things requires them to be able to identify and operate all valves and lines. After about 9 months, they can move to the second shift.

The facility also has a safety consultant that trains personnel on safety precautions, so called slip, trip and fall training. Records for that training are maintained in personnel files in the Georgetown offices.

Facility personnel work as operators, dock men, maintenance men, or trainees. Dock men work off-site at the Pier 91 dock. Maintenance men would not be involved in management of hazardous waste.

Drum Storage

Nine drums were observed behind tank 113. The tanks were not labeled. The facility Part A does not provide for container storage, but these wastes were classified as state dangerous waste. B. Moody indicated that the drums contained material from the sludge tanks that they were unable to process through their centrifuge. The rest of the sludge removed from the sludge tanks (55 drums) was shipped to Chem Waste Securities in Arlington, Or (see attached manifest) as WT02 (state dangerous waste). According to B. Moody they may consolidate the material and ship it out.

Behind tank 112, a drum of sludge was observed. It was covered only by a wooden board, and was not labeled. Also observed were containers that had been emptied of hydrogen peroxide (an oxidizer used in treatment). These containers are cleaned out and rinsed. Wash water is discharged to the oil water seperator pit, and the containers are cut up and disposed of in the dumpster. Empty drums that contained treatment chemicals are sent to the Georgetown facility to be crushed, according to B. Moody.

Empty drums were stacked against the facility's rear fence. B. Moody indicated that they were used to process sludge removed from the sludge tanks, and that they will re-fill them.

Approximately 20 drums were observed in the facility warehouse. B. Moody said that those drums contained old boiler chemicals from Penoco. He said they were caustic and that they are treating them in their tanks a little at a time. The drums were not labeled. The drums, according to B. Moody, were never consigned to Chem Pro. The material would be going to water treatment tanks 96, 97, or 98, and there is no waste receipt for these materials and no waste analyses.

Tanks

Tanks were inspected. All hazardous waste and sludge tanks were on concrete floors, and within bermed areas. All were covered and there were no apparent leaks. Large tanks that contain oil and used oil are within bermed areas but are on dirt floors.

The rectangular tank which contains steam coils and is used to heat and treat machine oils, coolant and phenol containing liquids is not covered and is not within a bermed area. The tank was empty at the time of the inspection.

An unnumbered tank which is not included on the facility diagrams was observed. According to B. Moody the tank was recently added and contains some solid caustic material in the bottom. It had a caustic sign on it

Sumps are located at the base of tanks. There is a herringbone drain underneath which empties into the oil/water seperator.

The facility has discontinued use of a long rectangular compartmentalized tank that had been used for water treatment, according to Bob Moody. Liquid was still in the tank. B. Moody said they have been able to achieve necessary water treatment in the large tanks with pH adjustment.

Treatment of hazardous waste occurs in tanks. According to B. Moody it occurs in tanks 115,116, 117, and 165. Treatment is not done until enough material is accumulated in the tank to make it cost effective. Treatment usually takes less than a week. Upon completion of treatment, the liquid is discharged to one of the waste water tanks for eventual discharge under the Metro permit.

The facility also has an oil/water seperator pit. It is underground and has a metal grate over the top of it. Oily water loads are discharged to it. The facility has large screener baskets for filtering the material in the oil water seperator pit. The solids are drummed and shipped out as hazardous waste after dewatering

Operations Office

An operations office is maintained on site for the operators. Daily tank gauge logs, facility analytical equipment, a telephone, and operations logs are kept there. Analytical equipment includes a closed cup flash point tester, colorimetric kits for pH, chlorinated hydrocarbons, and a centrifuge.

Findings

Specific findings appear above and on the attached checklist. The checklist (page I-1) contains a summary of findings.

CHEMPRO– PIER 91
PHOTOGRAPHIC LOG – PHOTOS TAKEN 7/15/86

Photo No.	Location	Description
1	front – parking area	view of front of the facility
2	front – parking area	truck loading area
3	front – parking area	oil & water seperator
4	front – parking area	operations office (elevated). tanker truck and oil & water seperator
5	front – parking area	truck unloading area, warning signs
6	front – parking area	oil/water seperator
7	front – parking area	oil/ water seperator & centrifuge
8	front – parking area	oil/water seperator valves
9	front – parking area	valve & manifold system next to oil/water seperator
10	front – parking area	same as #9
11	operations office	inside operations office
12	center of facility	close up of waste oil tanks showing cement floor & valves, Tank row 106 – 112
13	center of facility	close up of top of waste oil tanks showing valves. Tank row 106 – 112
14	south of waste oil tanks in center of facility	tanks 94 –96
15	south of waste oil tanks in center of facility	tank 98
16	center of facility	bottom of oil treatment tank #105. Close up of valve and sump

17	center of facility	waste tank & sump
18	center of facility	new tank not being used.
19	center of facility looking south	tank #109
20	center of facility	tanks # 115, 116 & 117
21	near east border	hazardous waste tanks, concrete berm wall & railroad tracks - fence in background
22	center of facility	pipe alley & concrete berm
23	center of facility	pipe alley
24	center of facility looking east	overview of tanks
25	center of facility	close up of tank # 117
1A	rear of east section of tank storage area	tank #112 in background, sludge dewatering equip. in foreground
2A	same as 1A	same as 1A
3A	east section, rear of tank 112	barrel of sludge
4A	same as 3A	barrel of sludge
5A	east Section, behind the tanks 113 - 119	tank 113 in background & barrels in foreground
6A	east boundary	signs & open fence at rear of facility
7A	east boundary	same as 6A
8A	near east gate	storage shed & containers
9A	east section	black drums near fence
10A	center of facility near tanks 106 & 108	old water treatment tank-from top view looking down
11A	center of facility near tanks 106 & 108	rectangular tank-side view
12A	same as #11A	Same as #11A

13A	same as #11A & 12A	Same as #11A and 12A
14A	northeast section in warehouse	Barrels and signs
15A	northeast section in warehouse	drums
16A	northeast section in warehouse	interior of main storage area black boiler chemical drums
17A	center section	foam system for fire response
18A	West view from office building	Unloading truck, workers & oil seperator building
19A	West view from office building	Truck unloading rack
20A	Office building North Section	Signage
21A	Office building North Section	South view from office, additional signage
22A	Same as #20A	Same as #20A
23A	front - parking area	Signage east of oil/water seperator.

Chem Pro
Pier 91
7/15/86

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

I. General Information
II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
III. Generator Regulations (40 CFR 262)
IV. Transporter Regulations (40 CFR 263)
V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised November 21, 1983)

A. Date/Time Inspection commenced: 7/15/86 9AM

B. Facility
EPA/State ID WAD) 000 812 917
Name & Addresses Chemical Processors, Inc.
1. Mailing: 5501 Airport Way South
2. Location: Pier 91
Seattle, WA

Contact: Dennis Stefani
Telephone: (206) 767-0350

C. Compliance Summary

	IN	OUT	N/A
RCRA (Statute)	( )	( )	( )
40 CFR 270	( )	( )	( )
40 CFR 124	( )	( )	( )
40 CFR 261.5	( )	( )	( )
40 CFR 262	( )	(✓)	( )
40 CFR 263	( )	( )	(✓)
40 CFR 264 (Permit)	( )	( )	(✓)
40 CFR 265	( )	( )	( )

Specific Violations: 262.11 - failure to make haz. waste determination; 265.13 - deficient Waste Analysis Plan (subject of State Enf. order); 265.15 - insp. logs don't include time; 265.16 - deficient training program and records; 265.52 - deficient contingency plan; 265.71 - failure to date manifests upon receipt; 265.73 - no insp. logs for 2 periods; 265.112 deficient closure plan & 265.142 deficient closure cost estimates (subject of State enf. order); 265.143 - trust Agreement lacks required wording & unpermitted container storage - if drums in storage are haz. waste - (no analytical info. available)

D. Inspector

Name (Print) Andrew Boyd Title: EPS
Signature
Organization EPA Region 10
Phone (206) 442-2806

E. **Inspection Participants:**

Name	Title	Phone #
Martha Rosenberg	EPS - EPA, Region 10	442-5153
Laureke Ashley	Ecology	885-1900
Bob Moody	Chem Pro Plant Mgr	
Dennis Stefani	Chem Pro - Mgr. of Reg. Affairs	
Rick Morton	Chem Pro - Operations Mgr	
Susan Donahue	Chem Pro - Compliance Specialist	

F. **Notification/Permit Information**

1. Started operation: _____ Date: 7/1/70
2. Notification filed: (YES) NO Date: 8/18/80
3. Part A application filed: (YES) NO Date: 4/18/80
4. Part B called/Date Due YES (NO) Date: _____
5. Part B application: YES NO Date: _____
6. Changes in Notification or Part A: Part A revised 7/23/85, Part A filed w/ State 2/18/86
7. Facility's classified as:

Generator	(X)
Transporter	(X)
Treatment facility	(X)
Storage facility	(X)
Disposal facility	( )
Small quantity generator	( )
Recycler	( )
Less than 90 day storage	( )
Wastewater treatment unit exemption (WWTU)	( )
Elementary neutralization unit exemption (ENU)	( )

8. Does facility have a Part A withdrawal request in ?
YES (NO)

Status _____

Comments: On 2/18/86 Part A filed w/ the State added 100,000 gallons per day - treatment (TO4) - described as Centrifuge AND OR belt press/filtration - 100 gpm

G. Hazardous Waste Generation (HW)and Management (List EPA Waste Code)

1. General information — According to Part A

a. Characteristic HW (DXXX)?

(1) Ignitability D001
(2) Corrosivity D002
(3) Reactivity D003
(4) EP Toxicity D004, D005, D006, D007, D008 D009, D010, D011

b. Listed HW?

(1) HW from non-specific sources (FXXX)

(2) HW from specific sources (KXXX)
K049, K050, K051, K052, K048 – Added 2/18/86

c. Discarded commercial chemical product(PXXX or UXXX)

(1) PXXX P110
(2) UXXX U188, U051, U052, U053, U197

d. Has facility petitioned to delist waste? YES (NO)

Date: Comments:

e. Does facility qualify for WWTU or ENU? (YES) NO

Comments: Waste Water Tanks – discharge to POTW upon pretreatment permit

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste?

(1) What are the wastes generated? Sludge from Tanks Boiler Chemicals

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)?

Comments: Sludge handled as hazardous waste – classified as State Hazard. Waste – Boiler Chemicals – been placed in WWTU

(3) Are records available on the determination(s)? YES (NO)

Not for Boiler Chemicals – said to be caustic – see NARRATIVE

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application? YES NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

a. EPA HW Code
b. HW description
c. Composition (including sampling requirements)
d. Process producing waste:
e. Rate of waste production
f. Time of storage
g. Waste handling prior to disposal
h. Waste disposal practice and manifest
i. Reporting and recordkeeping
j. Comments

H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised November 21, 1983)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES NO

   a. If yes, generator must comply with the generator regulations (262) and if stored for more than 90 days the applicable TSD regulations. Refer to Generator and/or TSD inspection checklist.

B. Small Quantity Generator (SQG) Regulations N/A

1. A SQG must determine if he generates a hazardous waste (262.11). YES NO

2. Which of the following describes the SQG's treatment and/or disposal of his HW?

   a. occurs on-site YES NO

   b. ensure delivery to an off-site facility, either of which is:

      (1) permitted under Part 270 YES NO

      (2) in interim status under Part 270 and 265 YES NO

      (3) authorized to manage HW by an authorized state YES NO

      (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO

      (5) (a) facility which

         (a) beneficially uses, re-uses recycles or reclaims his HW YES NO

         b. treats his waste prior to use, re-use, recycle, or reclamation YES NO

3. Does generator manifest his wastes (not required)? YES NO

III. Generator Regulations 40 CFR 262 (Date Revised November 21, 1983)

A. Is the facility or does facility claim to be a small quantity generator? YES (NO)

Comments:_____

B. Does generator transport its own waste? YES (NO)

1. If NO, what is contractor's EPA ID, name, address, and phone?
Resource Recovery - WAD061616812 (206) 767-0350

2. If YES, see Transporter Regulations (Section III).

C. Does generator use the manifest system? (YES) NO
Did for load shipped 7/14/86 - 55 drums manifest # 00053

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? YES NO
None Identified

What transporters or TSD facilities?
None identified

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information: Manifest # 00053

a. Manifest document number (YES) NO

b. Generator's name, mailing address, phone number, and EPA ID number (YES) NO

c. Name and ID number of each transporter (YES) NO

d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. (YES) NO

e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. (YES) NO

- Proper shipping name — YES NO
- Hazard Class — YES NO
- Identification number — YES NO

f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle. — YES NO

4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? — YES NO

5. Does the manifest contain an adequate number of copies to provide one copy for:

a. Generator's records — Not evaluated copies already distributed — YES NO

b. Records of each transporter — YES NO

c. TSD facility owner or operator's records — YES NO

d. Signature by each transporter and return to generator — YES NO

e. Signature by TSD facility and return to generator — load was shipped 7/14/86 no facility certification recd as of inspection — YES NO

6. Does the generator use the manifest properly by:

a. Signing the certification — YES NO

b. Obtaining signature and date of acceptance from initial transporter — YES NO

c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility — YES NO

d. Giving transporter the remaining copies of the manifest — Not evaluated — YES NO

7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? — YES NO

35 days had not yet passed at the time of the inspection

8. Does the generator submit an Exception Report to the U.S. EPA in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? N/A such a situation not identified YES NO

9. The Manifest Exception Report must include

   a. A legible copy of the manifest and

   b. A letter of explanation describing efforts and results of status investigation.

********** TSD FACILITIES SKIP TO MODULE V **********

D. Does generator operate a specific area on-site for container handling or storage? YES NO

1. Does generator comply with the requirements set forth in governing on-site waste accumulation: YES NO

   a. Labeling and marking YES NO

   b. Dating YES NO

   c. Inspections (weekly for containers) YES NO

2. Are incompatible wastes segregated? YES NO

3. What quantities of HW are stored? _____

4. What is the longest period that it has been stored? _____

5. Were there any hazardous wastes stored on site at the time of inspection? (90 day storage allowance is allowed only if waste is stored in accordance with §262.34; i.e. must be stored in containers or tanks. Thus need to make note if storing in waste pile, etc.) YES NO

   a. If yes, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? YES NO

   b. If not properly packaged or in secure tanks, please explain. YES NO

   c. Are containers clearly marked and labeled? YES NO

   d. Do any containers appear to be leaking? YES NO

   e. If yes, approximately how many? _____

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations Facilities, 40 CFR 265. (Date Revised November 21, 1983)

A. Type of Activity

1. Storage

a. Containers	(✓)
b. Tanks	
(1) Above ground	(✓)
(2) Below ground	( )
c. Surface Impoundments	( )
d. Waste Piles	( )
e. Other	( )

2. Treatment

a. Settling	(✓)
b. Evaporation	( )
c. Filtration	( )
d. Energy Recovery	( )
e. Incineration	( )
f. Thermal Treatment	( )
g. Recycling/Recovery	(✓)
h. Chem/Phys/Biological	(✓)
i. Other	( )

3. Disposal

a. Landfill	( )
b. Land Treatment	( )
c. Surface Impoundment	( )
d. Incineration	( )
e. Other	( )

4. Comments:

5. Are hazardous wastes accepted from "outside" (~~off~~-site) sources(wastes not generated on site)? (YES) NO

   a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES NO

   b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? YES NO

   c. How does the facility determine this?

facility waste analysis plan deficient subject of state enforcement order issued 6/30/86 - facility has 30 days to revise

See Attached Contractor Report

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it? YES NO

Describe: See Narrative Report. The extent of analysis varies depending on experience with handling particular waste streams

2. Does the facility follow a Written Waste Analysis Plan Does the Plan include?

Deficient subject of State order issued 6/30/80

a.	Parameters to be tested?	YES NO
b.	Methods of analysis?	YES NO
c.	Methods to get representative samples?	YES NO
d.	Testing frequency?	YES NO

Comments:

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES NO

4. Security

a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES NO See Below

(1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by an approach? YES NO n.a.

(2) Are they legible from a distance of 25 feet or more? YES NO

(3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? YES NO

Comments: The facility is in a fenced compound (Pier 91) with other facilities. Though the facility itself is not completely fenced, Pier 91 Reportedly provides 24 hour security for the Pier 91 compound — See Attached statement on Pier 91 security

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15? YES NO

a. Does it include inspecting all:

Monitoring equipment?	YES NO
Safety and emergency equipment?	YES NO
Security devices?	YES NO
Detecting equipment?	YES NO

Dangerous waste storage areas? YES NO

b. Is this inspection schedule maintained at the facility? YES NO

c. Is an inspection log maintained? YES NO

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? YES NO

(2) Does the log include:

(a) date of time of inspection? YES NO

(b) inspectors name? YES NO

(c) observations? YES NO

(d) date and nature of repairs? YES NO

Comments:

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? YES NO
What Type? (Classroom/on-the-job)

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES NO

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off systems. YES NO

(3) Communications or alarm equipment YES NO

(4) Response to fire and explosions YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. **Are records available at the facility for the following:**

(1) **Job title for each position related to hazardous waste management and maintaining equipment?** YES NO

(2) **Written job description for each job title?** YES NO except maint man

(a) **Does the job description include the skill, education or qualifications required for the position** YES NO

(b) **The duties assigned to that position?** YES NO

not for all positions — not available for Dockman, Prod. Foreman, & maint man

(3) **A written description of the type and amount of training to be given to those in each job position?** YES NO

(4) **A record of training completed or experience obtained for each job position by employee** YES NO

(5) **Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities?** YES NO

New training program being implemented

See trainings form for Nate Matthews — hired 6/78 not trained till 1983 + 1984

See. Attached Contractor Report (PRC) dated 8/19/86 for additional trainins program deficiencies —

OJT trainins not documented

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. **Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment?** (YES) NO

   Explain: (see Subpart D of this checklist), Facility has developed a contingency and spill prevention plan has a foam system and pump for fire fighting, & all hazardous waste tanks are within bermed areas with concrete floors

2. **Is internal emergency communication equipment or alarm systems installed?** (YES) NO

   What type? Operators in tank farm area carry 2 way radios - air horns also available, according to B. Moody - Site Mgr.

3. **Is a device (e.g., telephone) immediately available for summoning emergency assistance?** telephones in facility office & in operations office near tank farm (YES) NO

4. **Are fire extinguishers or other emergency equipment immediately available on-site?** YES (NO)

   fire extinguishers available, as is fire fighting foam system

5. **Is emergency communications and response equipment tested?** (YES) NO

   fire fighting foam system tested

   How often? weekly

6. **Is aisle space adequate for emergency response?** Probably (YES) NO

   What is the aisle spacing?

   Drums are stored 2+3 in a row

7. **Have any arrangements been made with local emergency response organizations?** (YES) NO

8. **Which organizations?** Crowley Environmental & Fire Dept.

9. **If local organizations have declined to enter into response agreements, is this documented in the facility's operating record?** No such record YES NO

   Explain

   Facility does not have written description of arrangements - does have a contract with Crowley Env. Services for equipment & personnel to contain & remove oil pollution - till 11/30/86

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO

   Explain:

2. Is internal emergency communication equipment or alarm systems installed? YES NO

   What type?

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

5. Is emergency communications and response equipment tested? YES NO

   How often?

6. Is aisle space adequate for emergency response? YES NO

   What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? YES NO

8. Which organizations?

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

   Explain

D. **Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50**

1. Has contingency plan been developed? (It may be a modified SPCC plan) — (YES) NO

2. Have incidents occurred where the plan has been implemented? NO - According to B. Moody — YES NO
did call Crowley Env. Services once - for an oil spill at the dock

3. Have incidents occurred where the plan should have been implemented but was not — YES NO

   Explain Not to my knowledge

4. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

   a. Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? Lists actions - does not describe. Lacks detail — no description of duties, responsibilities of emergency coordinators — YES (NO)

   b. Does the plan describe arrangements made with external emergency response organizations? Only have a contract w/ Crowley Env. Services — does not describe response procedures / no other written arrangements — YES (NO)

   c. Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? — YES (NO)
      No address

      (1) Is the list current? According to B. Moody — (YES) NO

   d. Is all emergency equipment available at the facility listed in the plan? — YES NO

      (1) Is the location and a description of the equipment included? — YES (NO)
      location not identified, map missing from site plan

      (2) Are capabilities described for each piece or equipment unit? — YES (NO)

   e. Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? — YES (NO)

f. Is a copy of the plan maintained at the active facility (versus main office)? (YES) NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations? Plan states that copies have been provided to Seattle Police & Fire Dept., Seattle & Washington State Emergency Response Team YES NO
To which?

5. Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO
How are they available Not necessarily - but on call person may not be an emergency coordinator — Have an on call person at all times — Contacted by answering service 24 hours

6. What are the limits of this person's authority to respond to emergencies? According to D. Stefani - full authority to respond - Also have Crowley Env. Services already on contract

a. Has an emergency occurred? YES (NO) Not according to B. Moody

b. Was the plan implemented? YES NO

c. (Describe the incident) N/A

E. **Subpart E - Manifest System, Recordkeeping, and Reporting 40 CFR 265.70**

Reviewed Manifests for loads received in February 1986 — copies Attached

1. **Manifest System**

a. **Upon receipt of a manifested hazardous waste shipment, does the TSD facility:**

(1) **Sign and date each copy of manifest receipt of certifying waste?** YES NO
No date - manifest #s 60302, & 60255

(2) **Note any discrepancies on each copy?** NO discrepancies noted YES NO

(3) **Give delivering transporter one signed and dated copy of the manifest?**
Not determined YES NO

(4) **Send a S/D copy of the manifest to the generator within 30 days after delivery and?** Not determined YES NO

(5) **Retain a copy of each manifest at the facility for 3 years from delivery?** manifests on file from 1981 YES NO

b. **If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262?** YES NO
See Checklist page III-1

c. **Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as:** YES NO

(1) **Bulk waste-quantity variation of 10 percent or greater** check by gauging tanker before & after waste is unloaded - According to B. Moody

(2) **Batch waste - any variation in piece count** Receive tanker truck shipments Almost exclusively

(3) **Waste type - obvious differences discernible by inspection or waste analysis**

d. **If significant discrepancies are found, does the TSD facility:**
None identified

(1) **Reconcile discrepancies with generator or transporter within 15 days? or** YES NO

(2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? YES NO N/A

e. TSD facilities must keep a written operating record documenting the following details:

(1) Waste description and quantity received

(2) Methods and dates of its treatment, storage, and disposal

(3) The location and quantity of each HW at the facility

2. Operating Record

a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? YES NO
Do maintain operating records

b. Does the record contain the following information.

(1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? YES NO
Use Daily Activity Logs

(2) The location of each Hazardous Waste within the facility, and its quantity? YES NO

(3) A map showing disposal sites? YES NO N/A

(4) Summary reports and details of all incidents that require implementing the Contingency Plan? YES NO
Not implemented N/A

(5) Records and results of inspections as required (need only be kept three years)? YES NO
No weekly tank insp. logs for period 1/6/86 to 4/14/86 except & no monthly inspection report for 3/86

(6) All closure and post-closure cost estimates required for the facility? YES NO N/A

(7) The results of testing and waste analysis? YES NO

3. **Facility Reporting Procedures**

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES NO

See Ecology Inspection Report for insp 1/16/86

b. Is owner/operator familiar with procedures for emergencies? YES NO

Appears To Be

c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO

N/A

N/A

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES (NO)

2. If YES, what is the relevant process unit?

   a. Surface impoundment ( )
   b. Waste pile ( )
   b. Land treatment ( )
   c. Landfills ( )
   d. Other ( )
   Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES NO

4. If NO, has the facility implemented one of the following:

   a. GW Waiver [265.90(c)] ( )
   b. Alternate GW Monitoring System [265.90(d)] ( )
   c. Neutralization Waiver (265.90(e)] ( )
   d. Describe:

5. Does the ground water monitoring program consist of the following:

   a. At least 1 upgradient and 3 downgradient wells? YES NO
   b. GW Sampling and Analysis Plan YES NO
   c. GW sampling quarterly first year YES NO
   d. GW sampling semiannually after that YES NO
   e. Drinking Water Standards parameters YES NO
      Sampling frequency_____
   f. GW Quality parameters YES NO
      Sampling frequency_____
   g. GW Indicator parameters YES NO
      Sampling frequency_____
   h. GW elevation parameters YES NO
   i. Outline GW Quality Assessment Program YES NO
   j. Statistical Analysis of Indicator parameters YES NO

      Results:

6. Has the facility implemented GW Quality Assessment program. YES NO

   a. Date: _____
   b. Results:

7. Does the facility maintain the necessary records.

   a. Initial background parameter concentrations YES NO
   b. Subsequent parameters concentrations YES NO
   c. Statistical evaluations YES NO

8. Has the facility reported necessary information YES NO

   a. DW Standards for 1st year YES NO
   b. GW Indicator parameters annually YES NO
   c. Statistical evaluation YES NO

9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117) No - See NARRATIVE

The Closure Plan was the subject of an order by the Washington Dept. of Ecology on 6/30/86 - have 90 days to amend closure plan

   a. Description of how and when the facility will be partially closed (if applicable) and finally closed? No Partial Closure Planned YES NO

   b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility? YES NO

   c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO

   d. Comment: See NARRATIVE —

Post-Closure N/A No disposal indicated

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)

   a. Description of how post closure will be carried out for the next 30 years. ( ) ( )

   b. Notice to the local land authority within 90 days after closure is completed? ( ) ( )

   c. Notice in deed to property? ( ) ( )

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million? YES NO

(2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?

(a) If HW facility liability endorsement(s) ( )

(b) If HW facility certificate(s) of liability insurance ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mechanisms (specify) ( )

2. If a surface impoundment, landfill, or land treatment exist at the facility, NO N/A

b. (1) does facility maintained liability insurance for nonsudden occurrence in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million? YES NO

(2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?

(a) HW facility liability endorsement(s)' ( )

(b) HW facility certificate(s) of liability insurance' ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mehcanisms (specify) ( )

Policy SE8609337 - Fred S. James & Co. eff. 4/1/86

c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA? Yes

d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.51?

YES NO

- except - include references to State requirements

Comment:

2. Assurance

a. Closure

(1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? Yes NO

Closure Plan subject of state order issued 6/30/86 facility has 90 days to revise

(2) Is this cost estimate adjusted annually for inflation? last estimate prepared 9/85 YES NO

(3) Has facility established financial assurance for the closure of the facility (40 CFR 265.143)?

YES NO

(4) By what method has this been achieved:

(a)	Trust fund	( )
(b)	Surety bond (with standby trust)	( )
(c)	Letter of credit (with standby trust)	( )
(d)	Insurance	( )
(e)	Financial test	( )
(f)	Corporate guarantee	( )
(f)	Multiple mechanisms	( )

Closure Cost Estimates evaluated by GCA - EPA Contractor - see attached Report dated 3/31/86

(5) Has facility submitted an originally duplicate of financial assurance to RA? YES NO

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151

YES NO - include additional language or references to State Agencies

(7) Comment:

b. Post-Closure (Disposal Facilities) N/A

(1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO

(2) Is this cost estimate inflation adjusted annually YES NO

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES NO

(4) By what method has this been achieved:

(a) Trust fund ( )
(b) Surety bond (with standby trust) ( )
(c) Letter of credit (with standby trust ( )
(d) Insurance ( )
(e) Financial test ( )
(f) Corporate guarantee ( )
(g) Multiple Mechanisms ( )

8. Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator? YES NO

9. Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES NO

2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO

3. Are the containers always closed, except to add or remove waste? YES NO

4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO

5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO

6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO

7. Is the facility aware of and complying with the following requirements for incompatible wastes:

   a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

   b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

   c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

   Explain?

8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO

9. Comments:

J. Subpart J - Tanks (40 CFR 265.190)

1. Does this section apply to this facility? (YES) NO

2. Do tanks on the facility hold hazardous waste? (YES) NO

   If so, what are their contents? residual sludges

3. Is storage in tanks conducted such that:

   a. It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) (YES) NO

   b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) (YES) NO

   c. It does not produce uncontrolled flammable fumes or gases? (YES) NO

   d. It does not damage the tank? no damage observed (YES) NO

   e. It does not threaten the environment in other ways (i.e., leaks, spills)? (YES) NO

   Comments: No leaks or spills observed

4. Is 2 feet of freeboard maintained in uncovered tanks? YES NO

   If no, is secondary containment used? (YES) NO

   (Explain) except for Rec. tank used for treatment

5. Is the tank(s) continuously fed? YES (NO)

   If yes, is there a means to stop inflow? YES NO

   Explain

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? (YES) NO

   How:

   Waste feed cut-off ( )
   Bypass system to another tank ( )
   High level alarm ( )
   Other By gauging - before & after operations

7. Are inspections of the following conducted:

   a. Discharge control equipment? N/A — YES NO
      How often?

   b. Waste feed cut-off systems? N/A — YES NO
      How often?

   c. Data from tank monitoring equipment? — YES NO
      How often N/A —

   d. The level of waste in the tank? — YES NO
      How often? At least daily

   e. The structural integrity of tank? — YES NO
      How often? — weekly
      How are inspections conducted? — visual
      What is observed (looked for)? — look for corrosion, leaking valves and damage

      except no records for period 1/6/86 to 4/14/86

   f. The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? monthly — YES NO

8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When? TANK 118 - removed from service 1979 - was closed & removed

   a. Were all hazardous wastes and/or residues removed? — According to B. Moudy — YES NO

   b. What was the disposition of the wastes or residues (i.e., where did it go)? — YES NO

   c. When shipped? WAS empty

9. Are ignitable or reactive wastes placed in tanks? — YES NO

10. If yes, what measures are used to prevent ingnition or reaction?

11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? — YES NO
    no indication of such

12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? N/A — YES NO

13. Are "No Smoking" signs posted? — YES NO

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES NO

N/A

- Explain

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained? YES NO

Not in all cases — subject of State Order issued 6/30/80 - requires revised waste analysis plan

16. Does the company have and follow a written waste analysis plan? YES NO

a. Does the plan identify parameters used? YES NO

See attached Contractor Report & Narrative

Explain

Deficient

b. Sampling Method? YES NO

Deficient

Explain

c. How frequent is analysis repeated? YES NO

d. Are results of waste analysis and trial tests placed in the facility's operating record.

Yes - As conducted

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank? YES NO

waste analysis plan - deficient

K. Subpart K - Surface Impoundments (40 CFR 265.220)

1. Does this section apply to this facility? YES NO

2. Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? YES NO

3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO

4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO

5. Is a waste analysis or trial test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? YES NO

6. Are results of waste analyses documented in the facility's operating record? YES NO

7. Are the surface impoundments inspected on a routine basis? How often? YES NO

8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? YES NO

9. Comments:

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

L. Subpart L - Waste Piles (40 CFR 265.250)
M. Subpart M - Land Treatment (40 CFR 265.270)
N. Subpart N - Landfills (40 CFR 265.300)
O. Subpart O - Incinerators (40 CFR 265.340)
P. Subpart P - Thermal Treatment (40 CFR 265.370)
Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
R. Subpart R - Underground Injection (40 CFR 265.430)

VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR 264) (Date Revised November 21, 1983)

This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.